

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

United States of America

Case No. 3:17cr024

Plaintiff,

Judge Walter H. Rice

vs

Jason Rosales

Defendant.

SENTENCING MEMORANDUM

Now comes Defendant Jason Rosales, by and through Counsel, to respectfully submit his Sentencing Memorandum for the Court's consideration in determining the type and length of sentence that will be sufficient, but not greater than necessary, to comply with with the purposes of Ohio's sentencing structure. Jason Rosales stands before this Court to be sentenced for conspiracy to distribute drugs and attempting to possess with intent to distribute drugs.

Jason's parents divorced when he was young. He was shuttled back and forth between Ohio and Florida, primarily living with his father. Jason also lived in Colorado for a short time, and later, as an adult, lived in Mexico for a couple of years. He first consumed alcohol at age 10 and has experimented with drugs, but does not appear to have a drug addiction.

Jason attended 8th grade at North High School in Springfield, Ohio. He left school while in the 9th grade, having a low grade point average of 1.62. To his credit, and despite his educational deficits, Jason managed to maintain stable, legitimate employment in the fields of telemarketing, landscaping, security, and as a toxic mold specialist. He completed his GED.

At the time of his arrest, Jason was operating his own legitimate, security-type business and was trying to become a successful person, reforming substantially since his past offense in 2005. Details of his business were verified through the Ohio Secretary of State website. He was just building this business at the time of his arrest, and surveillance equipment he used in connection with it was seized by the police. He is known to be a hard worker. Jason's father believes Jason could benefit from additional vocational training. Jason's employment history indicates that he has had the initiative to remain gainfully employed in the past and that vocational assistance this may aid in his rehabilitation.

Jason has served as a father figure to his cousin's sons whose father was uninvolved in their lives due to an active addiction. He taught them to be respectful and to listen to their mother, and provided them with male guidance. Jason's mother cares for Jason's 94-year-old grandmother whose health has been fading fast. Jason's mother doesn't have a car, so he helped her get to doctors appointments and has been a huge help to her. Jason is his father's only living son.

Jason's mother, father, and cousin's children, as innocent parties, stand to suffer if Jason receives a lengthy sentence. It appears that with the proper guidance and rehabilitative efforts, Jason may be able to secure better employment and may be reformed to a degree that will serve as a deterrent to further criminal activity. He has no history of mental or emotional problems that might otherwise hinder his rehabilitation.

Moreover, Jason is 45 years old. It appears to be in the best interest of Jason, and society, for him to be able to leave the prison system and become gainfully employed. A lengthy prison sentence may serve to hinder him from securing future job opportunities that might otherwise have been made available to him. Jason has family support. Further, Jason is asking the Court not to impose a fine in this matter, as he is without the money to pay one.

In view of the foregoing, Defendant Jason Rosales is asking this Court for leniency in sentencing, and to impose the lowest possible sentence in this matter.

/s/Anthony S. VanNoy
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and accurate copy of the foregoing was served by filing it through the Court's ECF system which is to serve it upon all parties to this litigation.

/s/Anthony S. VanNoy
Anthony S. VanNoy